

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,
Debtors.¹

PROMESA
Title III

No. 17 BK 3283-LTS

(Jointly Administered)

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

PUERTO RICO HIGHWAYS AND
TRANSPORTATION AUTHORITY,
Debtor.

PROMESA
Title III

No. 17 BK 3567-LTS

APPLICATION AND ORDER FOR ADMISSION *PRO HAC VICE*

TO THE HONORABLE COURT:

COMES NOW, Matthew M. Madden, applicant herein and respectfully states:

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("**COFINA**") (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("**HTA**") (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("**ERS**") (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("**PREPA**") (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("**PBA**") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

1. Applicant is an attorney with the law firm Kramer Levin Naftalis & Frankel LLP, with offices at 2000 K Street NW, Washington, D.C., telephone no. (202) 775-4500, fax no. (202) 775-4510, and e-mail: mmadden@kramerlevin.com.

2. Applicant will sign all pleadings with the name Matthew M. Madden.

3. Applicant has been retained personally or as a member of the above-named firm by Franklin Advisers, Inc. and Nuveen Asset Management (collectively, the “HTA Insured Bondholder Group”) to provide legal representation in connection with the above-styled matter now pending before the United States District Court, District of Puerto Rico.

4. Since November 6, 2009, applicant has been and presently is a member in good standing of the bar of the District of Columbia, where applicant regularly practices law. Applicant’s District of Columbia bar license number is 991139. Since December 10, 2008, applicant has been and presently is a member in good standing of the bar of the Commonwealth of Massachusetts, where applicant regularly practices law. Applicant’s Massachusetts bar license number is 672501.

5. Applicant has been admitted to practice before the following courts: District of Columbia (2012); U.S. Court of Appeals, Second Circuit (2011); U.S. Court of Appeals, Third Circuit (2014); U.S. Court of Appeals, Fourth Circuit (2021); U.S. Court of Appeals, Fifth Circuit (2021); U.S. Court of Appeals, Sixth Circuit (2016); U.S. Court of Appeals, Eleventh Circuit (2020); and U.S. Supreme Court (2014).

6. Applicant is a member in good standing of the bars of the courts listed in paragraph 5.

7. Applicant is not currently suspended from the practice of law before any court or jurisdiction.

8. Applicant is not currently the subject of any complaint for unethical conduct, disciplinary proceeding or criminal charges before any court or jurisdiction.

9. During the past three years, applicant has not filed for *pro hac vice* admission in the United States District Court of Puerto Rico.

10. Local counsel of record associated with applicant in this matter is: Linette Figueroa Torres of Toro Colón Mullet P.S.C., P.O. Box 195383, San Juan, Puerto Rico 00919-5383, telephone no. (787) 751-8999, fax no. (787) 763-7760, and email: lft@tcm.law.

11. Applicant has read the Local Rules of this court and will comply with same.

12. Applicant has read the Local Rules of the United States District Court for the District of Puerto Rico which provide in part that attorneys appearing *pro hac vice* must comply with the provisions set forth therein and pay an admission fee of \$300.00 per appearance in each new case before the Court. Accordingly, payment of the *pro hac vice* admission fee is being made herewith.

WHEREFORE, applicant respectfully requests to be admitted to practice in the United States District Court for the District of Puerto Rico for the above-styled case only.

In San Juan, Puerto Rico, this 29th day of July 2022.

RESPECTFULLY SUBMITTED.

/s/ Matthew M. Madden
MATTHEW M. MADDEN

**KRAMER LEVIN NAFTALIS
& FRANKEL LLP**

2000 K Street NW, 4th Floor
Washington, D.C. 20006
Tel.: (202) 775-4500
Fax: (202) 775-4510
Email: mmadden@kramerlevin.com

I HEREBY CERTIFY, pursuant to Local Rule 83A(f), that I consent to the designation of local counsel of record for all purposes.

In San Juan, Puerto Rico, this 29th day of July of 2022.

RESPECTFULLY SUBMITTED.

/s/ Linette Figueroa-Torres

LINETTE FIGUEROA-TORRES

USDC-PR No. 227,104

TORO COLÓN MULLET P.S.C.

P.O. Box 195383

San Juan, Puerto Rico 00919-5383

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Fax: (787) 763-7760

Email: lift@tcm.law

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 29th day of July, 2022, I electronically filed the forgoing document with the Clerk of Court by using the CM/ECF system, and a copy of the foregoing pleading has been electronically mailed to all attorneys of record.

In San Juan, Puerto Rico, this 29th day of July of 2022.

RESPECTFULLY SUBMITTED.

/s/ Linette Figueroa-Torres
LINETTE FIGUEROA-TORRES
USDC-PR No. 227,104

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ORDER

The Court, having considered the above Application for Admission *Pro Hac Vice*, orders that:

☐ the application be granted. The Clerk of Court shall deposit the admission fee to the account of Non-Appropriated Funds of this Court.

☐ the application is denied. The Clerk of Court shall return the admission fee to the applicant.

SO ORDERED.

In San Juan, Puerto Rico, this ____ day of _____, 2022.

U.S. District Judge